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PROJECT NO. 51812

ISSUES RELATED TO THE STATE §  
OF DISASTER FOR THE §  
FEBRUARY 2021 WINTER §  
WEATHER EVENT §

PUBLIC UTILITY COMMISSION  
OF TEXAS

2021 MAR -9 PM 3:47

PUBLIC UTILITY COMMISSION  
FILING CLERK

**COMMENTS REGARDING  
FEBRUARY 15, 2021 COMMISSION ORDER**

Denton County Electric Cooperative, Inc. d.b.a. CoServ Electric, (“CoServ”) files these Comments Regarding the Public Utility Commission of Texas’s (“Commission”) February 15, 2021 Order – Order Directing ERCOT to Take Action and Granting Exception to Commission Rules (the “February 15 Order”).

**I. RELIEF REQUESTED**

CoServ is an electric cooperative that serves 267,000 customers in Texas. CoServ respectfully requests that the Commission enforce, or, in the alternative, clarify, its February 15 Order<sup>1</sup> to ensure that immediately after customer firm load shed ended at 23:55 on February 17, 2021, administrative price adders were removed from the real time energy market clearing prices. The economic effect of not enforcing, or in the alternative not clarifying, the February 15 Order will be hardship and financial detriment to our customers for years to come. CoServ supports the comments filed by Pedernales Electric Cooperative, Bandera Electric Cooperative, Bluebonnet Electric Cooperative and the City of San Marcos (“Joint Commenters”) filed in this docket on March 9, 2021.

CoServ requests that the Commission enforces its February 15 Order – as written – and direct the Electric Reliability Council of Texas (ERCOT) to remove the system-wide offer cap price adder from the real-time energy prices for the 32 hours firm load was not being shed. This action is entirely within the Commission’s authority and would correct the financial penalty that Load Serving Entities incurred for acting quickly in a humanitarian way to stop the suffering of

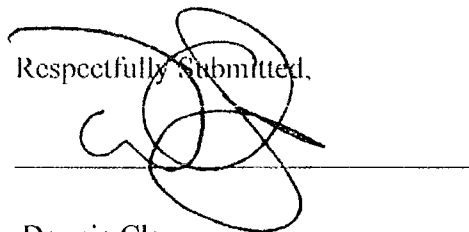
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<sup>1</sup> Project No. 51617, *Oversight of the Electric Reliability Council of Texas*, Order Directing ERCOT to Take Action and Granting Exception to Commission Rules (Feb. 15, 2021) (refiled in Project No. 51812). The February 15, 2021 Order was replaced by an Order on February 16, 2021, but the February 16 Order did not change the section of the February 15 Order addressed here.

Texans and restore power as quickly as possible. Such an order would also clearly resolve this issue, providing regulatory certainty for the market participants, a result which all market participants desire. The Commission has clear authority to enforce, or clarify if necessary, its February 15 Order as explained in the comments filed by the Joint Commenters and CoServ fully supports and agrees with those Comments.

CoServ appreciates the opportunity to provide these comments to the Commission.

Respectfully Submitted,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke, positioned above a solid horizontal line.

Donnie Clary  
President and CEO  
CoServ Electric